

**From:** [Angela Hughes](#)  
**To:** [Ursula Lennox](#)  
**Cc:** [Ruth Hartje](#)  
**Subject:** Re: LICRAT and Steel sorting  
**Date:** 02/23/2012 02:26 PM

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Hello Ursula,

I believe you have copied the wrong Angela on your email. I am located and EPA Headquarters and the Angela Hughes in in the email traffic below is with ODEQ in Oklahoma.

Angela

Angela C. Hughes  
U.S. EPA (MC-3605M)  
1200 Pennsylvania Ave., NW  
Washington, DC 20460  
(202) 564-4390 Phone  
(202) 564-0735 Fax

▼ [Ursula Lennox---02/23/2012 02:18:31 PM---Good Afternoon Ruth, The extent of what was accepted at the repository, is contained in the document](#)

From: Ursula Lennox/R6/USEPA/US  
To: Ruth Hartje <[rhartje@sai.ok.gov](mailto:rhartje@sai.ok.gov)>  
Cc: Angela Hughes/DC/USEPA/US@EPA  
Date: 02/23/2012 02:18 PM  
Subject: Re: LICRAT and Steel sorting

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Good Afternoon Ruth,

The extent of what was accepted at the repository, is contained in the document that was coordinated with ODEQ. Though EPA appreciates the attached e-mails that reflects the discussions that have transpired between you and ODEQ, inquiries related to the buyout and demolition efforts need to be directed to ODEQ. Have a pleasant afternoon.

Ursula Lennox  
Remedial Project Manager  
U.S. EPA (6SF-RL)  
(214) 665-6743  
[Lennox.Ursula@epa.gov](mailto:Lennox.Ursula@epa.gov)

▼ [Ruth Hartje ---02/23/2012 12:13:07 PM--- Good afternoon Ursula.](#)

From: Ruth Hartje <[rhartje@sai.ok.gov](mailto:rhartje@sai.ok.gov)>  
To: Ursula Lennox/R6/USEPA/US@EPA  
Date: 02/23/2012 12:13 PM  
Subject: LICRAT and Steel sorting

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Good afternoon Ursula,

I'm trying to wrap up this investigation and have a few loose ends.

I've asked Angela to provide me some sort of documentation from EPA to say that the steel going into the Repository had to be sorted by the contractor, aside from the white goods, auto's etc.

The RFP/Contract with the demo contractor just stated that large metal objects would not be allowed. Angela tells me that they didn't realize that this also meant no structural steel.

If EPA required additional sorting - aside from large metal objects - what threshold of steel had to be sorted: for example what size was not allowed? I'm actually confused with the designation "structural steel." Can you clear this up for me?

My thinking is if the contract stated no large metal objects then the contractor should not have been paid extra for sorting them out. Of course this would be different if the EPA added a requirement that was not originally in the contract.

Thanks for your help. I've forwarded my communication with Angela to show you what we've already discussed.

Ruth Hartje

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*Ruth Hartje*

Office of the State Auditor and Inspector  
440 S. Houston Ave, Suite 307  
Tulsa, Oklahoma 74127  
918.406.9665

----- Original Message -----

**Subject:** RE: EPA Sorting

**Date:** 2/23/12 7:54am

**From:** "Hughes, Angela" <Angela.Hughes@deq.ok.gov>  
**To:** 'Ruth Hartje' <rhartje@sai.ok.gov>

No, that's not what I'm saying.

Please see my comment below from 2/17.

“For clarification your comment – the “large metal was already in the RFP” – EPA dropped that on the contractor after the contract was let. The RFP “large metal” was white goods, automobiles, and metal equipment – not structural steel. Everyone thought structural steel COULD go to the repository until EPA said no.”

My comment from 2/22

EPA never said they wouldn't accept **any** metal – just the kind that would be hard to compact – ie structural steel, white goods, etc.

**Angela Hughes**  
Environmental Programs Manager  
Land Protection Division  
Oklahoma Department of Environmental Quality  
wk 405-702-5141  
cell 405-535-6054  
Angela.Hughes@deq.ok.gov

**From:** Ruth Hartje [mailto:rhartje@sai.ok.gov]  
**Sent:** Wednesday, February 22, 2012 4:34 PM  
**To:** Hughes, Angela

**Subject:** RE: EPA Sorting

Are you saying that the RFP language "large metal objects," is what EPA required to be sorted? And that because auto's, white goods and metal equipment was listed in () that the contractor/Jack thought that those were the only things no allowed in the Repository?

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*Ruth Hartje*

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On 2/22/12 3:48pm, Hughes, Angela wrote:

No, it's a DCS email. I will forward it to you. It's pretty general. I did speak to Ursula today and she said the meeting mins were the best source she knew of for reference. Although, we all agree that it was discussed and agreed too it doesn't look like the EPA requirement for separation of steel components was written down during the meetings – only later in the DCS contract mod discussion.

I recall a meeting/conference call where EPA discussed issues with compaction and the concern that the steel components would get hung up in the trucks.

You are correct on your impression EPA did require that to be separated prior to disposal at the repository – it just wasn't documented very well.

**Angela Hughes**  
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[Angela.Hughes@deq.ok.gov](mailto:Angela.Hughes@deq.ok.gov)

**From:** Ruth Hartje [<mailto:rhartje@sai.ok.gov>]  
**Sent:** Wednesday, February 22, 2012 3:02 PM  
**To:** Hughes, Angela  
**Subject:** RE: EPA Sorting

And then an email regarding contract mod that briefly mentioned separation of steel. But that's it.

Is this email from the EPA? I have early EPA minutes telling about no white goods, etc, but nothing that says they required the contractor to start sorting other metals from the debris. I was under the impression that they made CWF start sorting other metal, besides white goods and autos, etc.

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[Ruth Hartje](#)  
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On 2/22/12 9:48am, Hughes, Angela wrote:  
I've found some EPA meeting mins that refer to the kind of metal discussed earlier white goods etc. And then an email regarding contract mod that briefly mentioned separation of steel. But that's it.

EPA never said they wouldn't accept **any** metal – just the kind that would be hard to compact – ie structural steel, white goods, etc. I'll double check with Ursulla.

**Angela Hughes**  
Environmental Programs Manager  
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[Angela.Hughes@deq.ok.gov](mailto:Angela.Hughes@deq.ok.gov)

**From:** Ruth Hartje [<mailto:rhartje@sai.ok.gov>]  
**Sent:** Tuesday, February 21, 2012 4:39 PM  
**To:** Hughes, Angela  
**Subject:** RE: EPA Sorting

Yes, I understand about the different types of metal. But do you have something from EPA that says that they will accept no metal, whatsoever?

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On 2/17/12 8:36am, Hughes, Angela wrote:

For clarification your comment – the “large metal was already in the RFP” – EPA dropped that on the contractor after the contract was let. The RFP “large metal” was white goods, automobiles, and metal equipment – not structural steel. Everyone thought structural steel COULD go to the repository until EPA said no.

That changed condition caused extra effort for the contractor that was unknown at the time of bidding.

**Angela Hughes**  
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**[Angela.Hughes@deq.ok.gov](mailto:Angela.Hughes@deq.ok.gov)**

**From:** Ruth Hartje [<mailto:rhartje@sai.ok.gov>]  
**Sent:** Thursday, February 16, 2012 4:50 PM  
**To:** Hughes, Angela  
**Subject:** RE: EPA Sorting

I'm assuming..since CWF got a contract mod towards the end for EPA sorting....but large metal was already in the RFP as something that couldn't go into the Repos. So, metal is all I know they were sorting and were paid extra for it.

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[Ruth Hartje](#)

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On 2/16/12 3:49pm, Hughes, Angela wrote:

Was this when EPA told the Trust/contractor that they couldn't accept large metal?

**Angela Hughes**  
**Environmental Programs Manager**  
**Land Protection Division**  
**Oklahoma Department of Environmental Quality**  
**wk 405-702-5141**  
**cell 405-535-6054**  
**[Angela.Hughes@deq.ok.gov](mailto:Angela.Hughes@deq.ok.gov)**

**From:** Ruth Hartje [<mailto:rhartje@sai.ok.gov>]  
**Sent:** Thursday, February 16, 2012 3:12 PM  
**To:** Hughes, Angela  
**Subject:** EPA Sorting

Angela,

Do you have anything from EPA addressing this issue? We've talked about it, but I never ran across any emails from them.



Don't spend too much time, if you can't find it.

Ruth

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*Ruth Hartje*

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